

HAL TAYLOR
Nevada Bar No. 4399
223 Marsh Ave.
Reno, NV 89509
Tel: (775) 825-2223
Fax: (775) 329-1113
haltaylorlawyer@gmail.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUSANNE SALVATI-BRYANT,)	
)	Case No. 2:17-cv-01406-JAD-CWH
Plaintiff,)	
)	
v.)	
)	
NANCY A. BERRYHILL,)	<u>CONSENT MOTION FOR</u>
Acting Commissioner of Social Security,)	<u>ENLARGEMENT OF THE</u>
)	<u>BRIEFING SCHEDULE</u>
Defendant.)	
)	

PLAINTIFF, SUSANNE SALVATI-BRYANT, ("Plaintiff"), by her attorney, Hal Taylor, moves this Honorable Court to grant her unopposed motion for a sixty (60) day enlargement of the briefing schedule through November 15, 2017, in order to file cross-motions to reverse or remand and to affirm the Commissioner's decision. In support of this Motion, Plaintiff states as follows:

Pursuant to this Court's Order (doc. 7), the cross-motions are due on September 16, 2017. This consent motion for an enlargement of the briefing schedule is submitted due to the lengthy administrative record of 1,877 pages and co-counsel and primary brief-writing attorney for Plaintiff being unavailable due to previously scheduled matters between September 26 – 29 and October 2 – 13, 2017.

Counsel for the Commissioner, Assistant Regional Counsel Sundeep R. Patel and Assistant United States Attorney Mark E. Woolf, were contacted on September 11, 2017, and informed counsel that there is no objection to this Motion.

WHEREFORE, Plaintiff respectfully requests that this consent Motion be granted, allowing an enlargement of the briefing schedule through November 15, 2017, in order to file cross-motions to reverse or remand and to affirm the Commissioner's decision.

Date: September 12, 2017

Respectfully submitted,

/s/Hal Taylor

HAL TAYLOR

Nevada Bar No. 4399

223 Marsh Ave.

Reno, NV 89509

Tel: (775) 825-2223

Fax: (775) 329-1113

haltaylorlawyer@gmail.com

Attorney for Plaintiff

IT IS SO ORDERED.

DATED: September 13,
2017


C.W. HOFFMAN, JR.

UNITED STATES MAGISTRATE JUDGE